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Celltrion, Inc. and Celltrion USA, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

AMGEN INC. and AMGEN  
MANUFACTURING LIMITED LLC,

Plaintiffs,

CELLTRION, INC. and CELLTRION USA,  
INC.,

Defendants.

Civil Action No. 1:24-cv-06497  
(CPO-EAP)

**NOTICE OF JOINT  
OMNIBUS MOTION TO SEAL**

**RETURN DATE: DECEMBER 16, 2024**

*Filed Electronically*

**PLEASE TAKE NOTICE** that on December 16, 2024, or as soon thereafter as counsel may be heard, Plaintiffs Amgen Inc. and Amgen Manufacturing Limited LLC (collectively, “Amgen”) and Defendants Celltrion, Inc. and Celltrion USA, Inc., (collectively, “Celltrion”) (Amgen and Celltrion collectively, “the parties”), shall move jointly pursuant to Local Civil Rule 5.3(c) before the Honorable Elizabeth A. Pascal, U.S.M.J., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey, for the entry of an Order sealing limited portions of the following:

1. Letter to the Hon. Elizabeth A. Pascal, U.S.M.J., dated September 27, 2024, with Exhibits A-I annexed thereto (D.E. 131);

2. Letter to the Hon. Christine P. O’Hearn, U.S.D.J., dated September 30, 2024 (D.E. 134);
3. Joint Status Report with Exhibits A-O annexed thereto, dated September 30, 2024 (D.E. 135);
4. Letter to the Hon. Christine P. O’Hearn, U.S.D.J., dated October 7, 2024 (D.E. 139);
5. Letter to the Hon. Christine P. O’Hearn, U.S.D.J., dated October 14, 2024 (D.E. 148);
6. Letter to the Hon. Elizabeth A. Pascal, U.S.M.J., dated October 16, 2024, with Exhibits P-S annexed thereto (D.E. 150);
7. Letter to the Hon. Elizabeth A. Pascal, U.S.M.J., dated October 17, 2024, with Exhibit T annexed thereto (D.E. 151);
8. Letter to the Hon. Christine P. O’Hearn, U.S.D.J., dated October 21, 2024 (D.E. 155); and
9. Transcript, dated October 18, 2024 (D.E. 158).

**PLEASE TAKE FURTHER NOTICE THAT** the parties shall rely upon the accompanying Declaration of Liza M. Walsh, counsel for Amgen, with the attached Index, the Declaration of James S. Richter with the attached Index, counsel for Celltrion, with the attached Index, Proposed Findings of Fact and Conclusions of Law, and all papers submitted herewith. A proposed Order is also submitted for the Court’s consideration.

Dated: November 13, 2024

Respectfully submitted,

s/Liza M. Walsh

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